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Alan J. Lipkin Gabriel Brunswick

Attorneys for Drayton Plains (MI), LLC

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re :

: Chapter 11 SEARS HOLDINGS CORPORATION, *et al.*, :

Case No. 18-23538 (RDD)

Debtors. ¹ : (Jointly Administered)

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NOTICE OF APPEARANCE OF AND REQUEST FOR SERVICE OF DOCUMENTS BY DRAYTON PLAINS (MI), LLC

PLEASE TAKE NOTICE that Drayton Plains (MI), LLC ("Drayton Plains"), by and

through its attorneys, Willkie Farr & Gallagher LLP, hereby appears in the above-captioned

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

cases pursuant to 11 U.S.C. § 1109(b) and requests, pursuant to Federal Rules of Bankruptcy Procedure 2002 and 9010, that copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral and whether transmitted or conveyed by mail, courier service, hand delivery, e-mail, facsimile, telephone, or otherwise filed or made with regard to the captioned cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice of appearance nor any prior or later appearance, pleading, claim, or suit shall: (a) waive any right of the parties in interest: (1) to have final orders in non-core matters entered only after *de novo* review by a United States District Court judge; (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) to have documents served in accordance with Federal Rule of Bankruptcy Procedure 7004 and Federal Rule of Civil Procedure 4, or to any other rights, claims, actions, or defenses, setoffs or recoupments to which Drayton Plains is or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments, expressly are hereby reserved; or (b) constitute consent of Drayton Plains to the jurisdiction of

the Bankruptcy Court respecting any proceeding or matter commenced in these cases against or otherwise involving Drayton Plains.

Dated: October 25, 2018 New York, New York

Respectfully submitted,

WILLKIE FARP & GALLACHER LLP

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